

STEVEN G. KALAR  
Federal Public Defender  
ELIZABETH M. FALK  
Assistant Federal Public Defender  
19th Floor Federal Building  
450 Golden Gate Avenue  
San Francisco, CA 94102  
(415) 436-7700

Counsel for Defendant DICKMAN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
KRIS DICKMAN, )  
 )  
Defendant. )

No. CR-12-722 MMC

**STIPULATION AND ~~PROPOSED~~  
ORDER TO CONTINUE STATUS  
HEARING AND FOR EXCLUDING  
TIME UNDER 18 U.S.C. § 3161**

The parties in this case agree and jointly request the Court to move the change of plea hearing in the above captioned case from November 20, 2013 to December 6, 2013 at 10:00 a.m. The reason for this request is that defense counsel needs time to review the discovery materials with her client prior to entering a plea agreement in this matter,

The parties concur that granting the exclusion would allow the reasonable time necessary for effective preparation of counsel and continuity of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties also agree that the ends of justice served by granting such an exclusion of time for the purposes of effective preparation of counsel outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

Accordingly, due to the reasons stated above, the parties jointly move to continue the change of plea hearing to December 6, 2013 at 10:00 a.m.

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1 SO STIPULATED:

2  
3 MELINDA HAAG  
United States Attorney

4  
5 DATED: November 19, 2013

6 /s/  
KYLE S. WALDINGER  
Assistant United States Attorney

7  
8 DATED: November 19, 2013

9 /s/  
ELIZABETH FALK  
Attorney for Defendant Kris Dickman

10  
11  
12 ~~PROPOSED~~ ORDER

13 For the reasons stated above the Court hereby CONTINUES the status conference hearing  
14 in the aforementioned case from November 20, 2013 to December 6, 2013 at 10:00 a.m. The  
15 Court further finds that the exclusion from the time limits of this period applicable under 18  
16 U.S.C. § 3161 is warranted and that the ends of justice served by the continuance outweigh the  
17 best interests of the public and the defendant in a speedy trial. Denying the requested exclusion  
18 of time would deprive the defendant effective preparation of counsel, taking into account the  
19 exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).  
20

21 IT IS SO ORDERED.

22  
23 DATED: November 19, 2013

24   
THE HONORABLE MAXINE M. CHESNEY  
United States District Judge